| SOUTHERN DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK                        |                                |
|--|--------------------------------|
| TRIARCH ARCHITECTURAL SERVICES, P.C.,  |                                |
| Plaintiff,   | CIV NO.: 11-CV-2708 (AKH)      |
| - against - MEDALLION INC., VLADIMIR VORONCHENKO and GARTH HAYDEN ARCHITECT, | DECLARATION OF EVAN<br>MANDEL  |
| Defendants.  |                                |
| EVAN MANDEL declares under penalty of perjury                                | that the following is true and |

1. I am a member of Mandel Bhandari LLP, counsel to Plaintiff Triarch

Architectural Services, P.C. ("Triarch") in this action. I submit this declaration in support of

Triarch's motion to amend the Complaint. I have knowledge of the facts of this case as a result

of my observations.

correct:

- 2. Attached as Exhibit 1 is a true and correct copy of Triarch's Complaint in this action.
- 3. Attached as Exhibit 2 is a true and correct copy of the Court's docket sheet in this action.
- 4. Attached as Exhibit 3 is a true and correct copy of the Court's Civil Case Management Plan in this case.
- 5. Attached as Exhibit 4 is a true and correct copy of Triarch's Complaint that Triarch filed against Defendant Medallion Inc. in New York State Supreme Court.

6.

Attached as Exhibit 5 is a true and correct copy of Triarch's Proposed First

| Amended Complaint.    |                 |  |
|-----------------------|-----------------|--|
| Dated: March 23, 2012 |                 |  |
| New York, NY          | /s/ Evan Mandel |  |
|                       | Evan Mandel     |  |